



Annual Assessment of the Police Complaint and Conduct Performance 2023/24

Introduction

The Police and Crime Commissioner (PCC) has a statutory duty to monitor complaints against the police force. This includes a responsibility to hold the Chief Constable to account to ensure that Avon and Somerset Police (ASP) fulfil their duty under [Part 2 of the Police Reform Act 2002](#) in relation to the handling of complaints and conduct matters.

PCCs are required to publish certain information to allow the public to hold them to account. [The Elected Local Policing Bodies \(Specified Information\) \(Amendment\) Order 2021 guidance](#) sets out the information that must be published. This assessment is produced in accordance with the order and aims to provide a summary assessment of the performance of Avon and Somerset Police in the areas of complaints handling.

Information in this report is drawn from complaints data and statistics published by the Independent Office for Police Conduct (IOPC). This includes national [Annual Police Complaints Statistics](#) and [IOPC Quarterly Performance Data Bulletins](#) specific to ASP.

Effective oversight of the police complaints regime by the Police and Crime Commissioner (PCC) is essential for holding Avon and Somerset Police accountable for their performance in this area. Transparency plays a vital role in fostering public trust and confidence in policing. When the public can see and understand the actions taken and the reasoning behind them, they are much more likely to have trust in the police's efforts.

Members of the public can make a complaint to police about the service they receive. Complaints are mainly handled by the Professional Standards Department (PSD) and should be managed in line with [IOPC Statutory Guidance](#).

Glossary

Allegation	A police complaint case may include one or more allegations.
ASP	Avon and Somerset Police
Complaint Review	If the individual does not believe that the police handled their complaint correctly, they can ask the PCC to conduct a review of the outcome. A review is not a re-investigation, but it will consider whether the outcome was reasonable, proportionate and lawful. The Independent Office for Police Conduct (IOPC) are responsible for conducting reviews of criminal or complex matters, while reviews of quality of service complaints fall to the PCC. The letter received from the police will explain who is responsible for the review, and the complainant has 28 days from the date of this letter to request a review.
IOPC	Independent Office for Police Conduct who are responsible for how police forces deal with complaints.
OPCC	Office of the Police and Crime Commissioner
PCC	Police and Crime Commissioner
Police Complaint	Any expression of dissatisfaction with a police force that is expressed by or on behalf of a member of the public. It must be made by a person who meets the definition of a complainant. There must also be some intention from the complainant to bring their dissatisfaction to the attention of the force or local policing body.
PSD	Professional Standards Department
Schedule 3 Complaint	A complaint that has been assessed and recorded under Schedule 3 of the Police Reform Act 2002 and handled in accordance with the provisions of that Schedule. A complaint must be recorded under Schedule 3 if at any point the person making the complaint wants it to be recorded. This applies even if previous attempts have been made to handle the complaint outside of the requirements of Schedule 3. Where a complainant's wishes are unclear, reasonable steps should be taken to clarify what they are.
Outside of Schedule 3 Complaint	Complaints dealt with outside the requirements of Schedule 3 must be handled with a view to resolving them to the complainant's satisfaction. Handling a complaint outside of Schedule 3 provides an opportunity to address promptly the concerns a complainant has raised. Some complaints do not require detailed enquiries in order to address them. For example, the complainant may only want an explanation, or for their concerns to be noted or passed on. Handling such complaints outside of Schedule 3, promptly, may be the most efficient, effective, and beneficial way to resolve the complaint. It can assure the complainant that their concerns have been listened to and addressed, while potentially providing a learning opportunity for the force (and, if appropriate, any individuals involved).

Summary

1. Assessment of Complainant Satisfaction

One way the police assess complainant satisfaction is by analysing the resolution of complaints. They evaluate how many complaints are resolved amicably and how many remain unresolved to the point that the complainant seeks a review of the outcome. The number of complaint reviews upheld by the Police and Crime Commissioner (PCC) or the Independent Office for Police Conduct (IOPC) helps the police determine whether dissatisfaction is warranted and identify areas for improvement.

The Police and Crime Commissioner is reassured by Avon and Somerset Police's strong performance in promptly logging complaints and effectively resolving a high proportion of complaints outside of Schedule 3. However, the time taken to contact complaints is higher than the national average and they have seen a substantial increase in complaints logged compared to last year, placing them among the higher complaint rates per 1,000 employees in England and Wales. This highlights the need for continued monitoring and improvements in complaint handling and service delivery.

[Annual Police Complaints Statistics](#) reveal that in 2023/24, 34% of all complaints made to Avon and Somerset Police were resolved outside of Schedule 3. This means that a complaint has been promptly resolved to the complainant's satisfaction without being recorded. This category indicates that the issues were resolved satisfactorily for the complainants, who felt that formal recording was unnecessary. This represents a slight increase from the previous year, when 32% of complaints were resolved in this manner.

In some instances, complaints are initially addressed outside of Schedule 3, but if the complainant remains dissatisfied, they may request that the complaint be processed under Schedule 3 and the result will be recorded as 'unresolved'. In 2023/24, only 3% of complaints at ASP fell into this category, a decrease from 6% in the previous year. This is notably better than the national average of 7%, suggesting that ASP are effectively managing initial complaint resolutions.

If complainants remain dissatisfied with the handling of their complaint, they can submit a request for a review—previously referred to as an appeal—to be conducted by the Police and Crime Commissioner (PCC) or the Independent Office for Police Conduct (IOPC).

The 2023/24 [Annual Police Complaints Statistics](#) indicate that 209 review applications were submitted regarding ASP complaints. This accounts for 20% of the total eligible complaints, an increase from 18% last year and 13% in 2021/22. Of the reviews completed by the Police and Crime Commissioner (PCC), 23% were upheld, meaning they were found to have outcomes that were not reasonable or proportionate. This is slightly higher than the national average of 21%.

The [Q4 IOPC Avon and Somerset Police Complaints Information Bulletin](#) highlights that Complaint Reviews handled by the PCC as the Local Policing Body were completed in an average

of just 9 working days during 2023/24. This is notably more efficient compared to the national average of 50 working days and the Most Similar Force Average of 51 days. In contrast, IOPC Complaint Reviews for the same period took an average of 136 days to complete.

In reviews conducted by the Independent Office for Police Conduct (IOPC), statistics show that 31 reviews were completed for complaints under investigation, while 23 reviews pertained to non-investigated complaints. Among the investigated cases, 16% of the outcomes were deemed unreasonable or disproportionate, significantly lower than the national average of 33%.

In contrast, 35% of the outcomes for non-investigated complaints were found to be unreasonable or disproportionate, slightly exceeding the national average of 32%.

PSD has been working to enhance the broader management knowledge and skills in complaint handling by delivering targeted workshops and training sessions. Additionally, complaint handling guidance has been added to and updated on the ASP platform to make it more accessible. In 2024, 10 training sessions were delivered, with more planned for 2025.

PSD is also exploring the introduction of a new IOPC Toolkit, assessing how this tool will support line managers in effectively managing complaints.

In addition to the right of review, complainants also have the option to file a further complaint regarding the handling of their original complaint by ASP. This process is distinct from the review process and specifically addresses concerns about any deficiencies in service provided by the Professional Standards Department (PSD). In contrast, the review process focuses on whether the outcome was reasonable, proportionate, and lawful. All such complaints, whether upheld or not, are reviewed by a manager within the PSD, and any insights gained are shared with the staff for improvement.

The Professional Standards Department utilise a data visualisation software to analyse data relating to number of complaints received, the method of handling, the performance of successful handling of initial complaints outside of Schedule 3, the length of complaint investigation and the nature of allegations recorded and subsequent allegation results, all of which directly correlate to satisfaction levels.

The Professional Standards Department often receive positive feedback and thanks from complainants around how their complaint was handled in a quick and thorough manner. There is currently no measure in place to capture and analyse this feedback and no set process to ask complainants how satisfied they are with how their complaint was handled in the form of a questionnaire or feedback form. This presents a gap in information available in this area however it is worth recognising that for outside of Schedule 3 complaints, the success rate is consistently high at around 97%, demonstrating that the majority of complainants are satisfied with the resolution of their complaint.

2. Recommendations in relation to complaints handling

Any recommendations from Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) or the IOPC are recorded and tracked by the police Performance and Assurance Department. Any specific learning identified by the IOPC is captured by PSD. Themes and patterns are identified by a PSD performance analyst and communicated to department heads and thematic leads at a regular learning meeting. Organisational learning is reviewed by the Deputy Head of PSD who will meet with the relevant thematic lead and department head to look for onward accountability and agree implementation of any changes to policy or working practices that are required.

The PCC monitors progress towards the police implementation of recommendations made by HMICFRS and / or the IOPC in relation to complaints handling, and if the recommendations have not been accepted, requires an explanation as to why.

No recommendations have been received from the IOPC or HMICFRS in relation to complaint handling during the 2023/24 year.

3. Themes and trends in complaints, and action taken.

In 2023/24, ASP logged 2,646 complaint cases, marking an increase of 398 cases. This shows an increase of 20% on the same period last year.

However, cases formally recorded under Schedule 3 and handled through the 'otherwise by investigation' method have decreased by 16%. This decline reflects a shift toward handling more complaint cases outside of Schedule 3.

An average of 394 complaint cases were logged per 1,000 employees, which is slightly above the national average of 338 cases per 1,000 employees.

In 2023/24, the top five themes emerging from complaint allegations were as follows:

- Delivery of Service and Duties: 52%
- Police Powers, Policies, and Procedures: 17%
- Individual Behaviours: 706 allegations (16%)
- Discriminatory Behaviour: 4%
- Abuse of Position/Corruption: 3%

These themes have remained largely consistent compared to the previous year.

The PSD Management Performance Meeting regularly reviews and analyses complaint demand and trends. In addition, the Tactical Tasking and Coordination Group gathers and evaluates data themes and patterns. This collaborative process ensures that the leadership team engages with other police departments and directorate leads, facilitating the sharing of learning and insights with their senior leadership teams.

The [Independent Scrutiny of Police Complaints Panel \(ISPCP\)](#) regularly dip samples complaints and scrutinises ASP's handling of these matters. The [Independent Scrutiny of Police Powers Panel](#) review bodycam footage relating to complaints around the use of police powers to provide feedback, themes, and organisational learning. Both panels are facilitated by the Office of the

PCC and where themes are identified, both in terms of best practice and areas of concern, they are reported to ASP with an expectation that appropriate action will be taken.

ASP has revised its internal processes to enhance the quality of written responses in complaint outcome letters, following feedback from the ISPCP. The content of these letters will now be reviewed to ensure softer, more empathetic language is used, while also improving accessibility for all recipients.

4. Timeliness of complaint handling

Timeliness of Complaint Logging

In 2023/24, ASP took an average of 5 working days to log complaints and 9 working days to contact complainants. In comparison, the national average was 5 working days for logging complaints and 6 working days for contacting complainants. Compared to last year's figures, ASP experienced a reduction of 1 working day for logging complaints, while the time taken to contact complainants increased by 1 working day and is higher than the national average.

Timeliness of Handling Outside of Schedule 3

In 2023/24, ASP took an average of 13 working days to handle complaints outside of Schedule 3, which represents a slight increase of 1 working day compared to the previous year. Despite this increase, the duration remains well below the national average of 18 working days. This performance is particularly positive given that the workload of the Complaint Assessor position within PSD has grown by 20%, indicating that the service to the public has not been compromised, even with the higher volume of complaints being managed.

For complaints handled under Schedule 3 but not subject to investigation, ASP took an average of 97 days to finalise allegations, which is better than the national average of 106 days.

Timeliness of Handling Under Schedule 3

In cases handled under Schedule 3 that were subject to investigation, ASP took an average of 190 working days. While this is longer than the other two complaint categories, it aligns closely with the national average of 191 days.

ASP has implemented several measures to enhance the timeliness of complaint handling, including more robust management of performance through data analysis. The PSD management team regularly reviews performance through daily tasking, and the OPCC has direct access to this application for ongoing scrutiny and assurance.

Additionally, training is being provided to PSD complaint investigators on the principles of reasonable and proportionate complaint handling to ensure complaints are resolved efficiently and within appropriate timeframes. These initiatives have effectively managed the growing volume of public complaints, despite the lack of additional resources in this area.

5. Quality assurance mechanisms in place to monitor and improve the quality of police responses to complaints

PSD also utilise monthly Departmental Leadership Meetings to undertake regular assurance on the handling of complaints. This is used to identify improvements which is monitored and tracked as part of the department's single delivery plan of actions. Implementing more structured supervisor reviews and quality assurance processes which look at regulatory compliance, data quality and ensuring all objectives in complaint handling plan are completed by the investigating officer, to improve the quality of the complaint investigations.

When complaints are reviewed by the Office of the Police and Crime Commissioner (OPCC), recommendations for improvement are made to ASP. In 2023/24, 33 complaint reviews conducted by the PCC resulted in recommendations for ASP, an increase from 24 in the previous year.

As mentioned earlier in this report, complainants have the right to submit a further complaint regarding the handling of their original complaint if they are dissatisfied with how the Professional Standards Department (PSD) managed it, rather than the outcome itself. Such complaints will be recorded, assessed, and managed by the PSD. Insights gained from this process are captured and used to enhance internal procedures and the overall quality of service provided.

The Learning Assessment Tasking Group plays a key role in identifying lessons and Continuing Professional Development opportunities through the outcomes of complaints and misconduct cases. PSD holds regular meetings with stakeholders across the organisation to capture and disseminate key learnings. These outcomes lead to improvements in internal policies and procedures, as well as additional training for staff and officers. Additionally, the Head of PSD is planning to launch a regular VLOG to further share valuable insights and learning across the organisation.

The [Independent Scrutiny of Police Complaints Panel](#), facilitated and co-ordinated by the OPCC, regularly conducts dip samples of complaints to assess the quality of responses. Feedback and insights from these reviews are communicated to ASP through written reports, verbal updates during quarterly panel meetings, and other governance channels.

All complaints are investigated by trained staff, who are supervised by police Sergeants and Inspectors responsible for conducting quality assurance reviews. Data quality is maintained using a data analytics tool called Qlik, alongside a supervisory review process to ensure accuracy and reliability.

6. How the police are complying with Equality Diversity and Human Rights (EDHR) legislation in the handling of complaints and misconduct

ASP analyse and monitor complaint and misconduct data relating to protected characteristics and outcomes. This data is scrutinised by PSD management and is also shared at a high-level governance board. Protected characteristics, complaint themes such as discrimination and outcomes are all considered and relevant learning is captured and acted on.

PSD has established a cohort of volunteers, known as *Lived Experience Practitioners*, to review complaints related to discrimination. This group consists of 20 volunteers, representing a diverse

range of protected characteristics and lived experiences, including race, nationality, gender, age, LGBT+, mental and physical health, and disability. These practitioners are helping to integrate lived experience insights into complaints and misconduct investigations, enabling a more effective response to emerging issues of both internal and external discrimination.

Other key initiatives include:

- The appointment of a dedicated single point of contact for lived experience matters.
- Finalising written guidance for volunteers, Investigating Officers, and the Appropriate Authority, which will soon be reviewed by the Legal Department and circulated.
- Completing consultations with the Data Protection Office.
- Reviewing and enhancing ongoing training programs for volunteers.
- Establishing biannual sessions for volunteers to discuss learnings and provide feedback.
- Expanding volunteer recruitment in collaboration with REACH (formerly known as the Avon and Somerset Black Police Association).

These efforts aim to further embed lived experience in the investigation process, ensuring a more inclusive and informed approach to handling complaints.

ASP's website has been enhanced to offer a more user-friendly experience for complainants, particularly those with protected characteristics. These improvements aim to streamline the process, increase accessibility, and provide information in multiple languages. This work was recognised by HMICFRS during a recent inspection.

In 2024, community meetings were held in several areas to discuss complaints-related matters, gather feedback, and improve accessibility. These meetings also helped to better understand the views and needs of local residents, fostering trust in both ASP and the PSD. These community engagements will continue throughout 2025.

7. Administrative arrangements the Police and Crime Commissioner has put in place to hold the chief constable to account for complaints handling.

Senior members of the OPCC team meet regularly with the Professional Standards Department at a strategic level to discuss complaint handling performance. Other members of the OPCC are in continuous communication with PSD to discuss tactical matters and raise areas of concern. OPCC leads have access to the performance dashboards for PSD and can dip sample and test data sources as needed. OPCC senior leads attend regular strategic meetings with PSD and the wider organisation to review performance in this area, ensure organisational learning and recognise opportunities, success and risk.

The quarterly [Independent Scrutiny of Police Complaints Panel](#) provides written and verbal scrutiny to police around how complaints have been handled to the Head of PSD.

Data is also reported to the [Governance and Scrutiny Board](#) for further analysis and scrutiny. This is information provided both by the force and due regard is given to the HMICFRS assessments in this area (Vetting, Complaints Handling and Counter Corruption). This is the most senior governance meeting in Avon and Somerset Policing: it is chaired by the PCC and attended by police Chief Officers.